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signature pages*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION AND [PROPOSED]
ORDER MODIFYING SEALING
DEADLINES IN CONNECTION WITH
INDIVIDUAL PLAINTIFFS' SECOND
AMENDED MASTER COMPLAINT
(DKT. 494) AND LOCAL GOVERNMENT
AND SCHOOL DISTRICT MASTER
COMPLAINT (DKT. 504)**

STIPULATION

The Individual Plaintiffs and Defendants TikTok Inc., ByteDance Inc., TikTok Ptd. Ltd., and ByteDance Ltd. (the “TikTok Defendants”) submit this Joint Stipulation and Proposed Order modifying the TikTok Defendants’ deadline to move to seal redacted material in the Individual Plaintiffs’ Second Amended Master Complaint (“SAMC”) (Dkt. 494) and Local Government and School District Plaintiffs’ Master Complaint (“School District Master Complaint”) (Dkt. 504) and stipulate as follows:

WHEREAS, on December 15, 2023, the Individual Plaintiffs filed their SAMC, which withdrew certain Counts and incorporated by reference selected paragraphs from complaints filed (1) by the Attorney General of New Mexico against the Meta Defendants and (2) by the Attorney General of Utah against the TikTok Defendants, portions of which were in turn filed under seal in their respective originating jurisdictions;

WHEREAS, the complaint filed by the Attorney General of Utah includes provisional redactions pursuant to this Court’s Order Setting Sealing Procedures (Dkt. 341);

WHEREAS, on December 18, 2023, the Local Government and School District Plaintiffs filed their Master Complaint.

WHEREAS, the School District Master Complaint includes provisional redactions pursuant to this Court’s Order Setting Sealing Procedures (Dkt. 341), including allegations attributed to the complaint filed by the Attorney General of Utah against the TikTok Defendants.

WHEREAS, under the Order Setting Sealing Procedures, the original deadline for Defendants to file omnibus sealing stipulations and/or motions addressing the redacted material in the complaints filed by the Attorney General of Utah against the TikTok Defendants was December 29, 2023 and, pursuant to the Parties’ stipulation, the Court extended that deadline to January 12, 2024 (Dkt. 515);

WHEREAS, the deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in the School District Master Complaint was January 2, 2023 and, pursuant to the Parties’ stipulation, the Court extended that deadline to January 12, 2024 (Dkt. 515);

WHEREAS, the Utah complaint includes a cumulative 15 pages of redactions and the School District Master Complaint includes a cumulative 10 pages of redactions as to the TikTok Defendants;

1 WHEREAS, in light of the amount of provisionally sealed material, the TikTok Defendants
 2 requested, and the Individual Plaintiffs granted, the TikTok Defendants an extension of the above sealing
 3 deadlines to January 17, 2024 at 5:00 PM, and the Parties agreed to extend the deadline to oppose any
 4 motion to seal to January 19, 2024 at 8:00 PM and the deadline to reply to any opposition to January 23,
 5 2024;

6 WHEREAS, the TikTok Defendants agree that they will provide the Individual Plaintiffs and Local
 7 Government/School District Plaintiffs with their initial proposals on what to seal on January 16, 2024, and
 8 the Parties will meet and confer on January 17, 2024;

9 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE
 10 COURT'S APPROVAL, THAT: the TikTok Defendants' deadline to file omnibus sealing stipulations
 11 and/or motions in connection with the Individual Plaintiffs' Second Amended Master Complaint (Dkt. 494)
 12 and Local Government and School District Plaintiffs' Master Complaint (Dkt. 504) is extended to January
 13 17, 2024 at 5:00 PM, the deadline for any opposition thereto is extended to January 19, 2024 at 8:00 PM,
 14 and the deadline for any reply thereto is extended to January 23, 2024.

15 **IT IS SO STIPULATED.**

16 DATED: January 12, 2024

Respectfully submitted,

18 By: /s/ Lexi J. Hazam

19 Lexi J. Hazam

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Yvonne Gonzalez Rogers
United States District Judge

ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 12, 2024

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake